

Message

From: Bouma, Stacey [Bouma.Stacey@epa.gov]
Sent: 8/20/2020 8:31:41 PM
To: Able, Tony [Able.Tony@epa.gov]
Subject: FW: GA Narrative
Attachments: GA Narrative Talking Points_9 5 19.docx

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From: Buffo, Corey <Buffo.Corey@epa.gov>
Sent: Thursday, August 20, 2020 12:22 PM
To: Bouma, Stacey <Bouma.Stacey@epa.gov>
Subject: GA Narrative

Hi Stacey. I saw you all had some activity on this. From what I am hearing, things may be getting lost in translation after Sara had a conversation with Jeanneanne. Of course, some time passed since we last talked about this topic so memories may have faded a bit as well. She is out for a couple weeks' vacation and I didn't have a chance to connect with her after that call, but I believe we never strayed from our prior position in September of 2019 when we all briefed Sara.

That position would be that we couldn't see the rationales developed by Region 4 that the changes (addition of the word "unreasonably" in two places) were substantive as compelling and something we could fully embrace, but we were otherwise agnostic as to the direction R4 would take (treat the changes as substantive or non-substantive, approve or disapprove). We did not see any issues of national program precedent were surfacing. Likely, any disapproval would need to be cleared with senior management, so we were just forecasting what we might offer if or when we are asked. We did have a rationale we provided in that last briefing to Sara (paper attached) that we might have been able to get behind, but the Region did not seem interested in taking that approach. That approach is at the top of page 3 of the attached.

What have not been saying is that we believe these changes are non-substantive. In intent, if not in execution, the state did seem to have programmatic goals with the change that one would not associate with a non-substantive change, though the record there too as to what the state's motives were was a bit unclear it seemed to us.

I hope all that was not unclear!

Happy to talk more, if it helps.